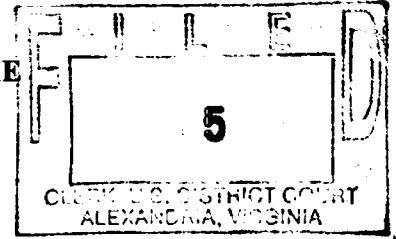


**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**



MARCUS MIAL, :
 :
Plaintiff :
 :
v. : Case No.: 1:11-cv-921
 :
STEPHEN O. SIMPSON, et al., :
 :
Defendants. :

STIPULATED PROTECTIVE ORDER

COME NOW the parties, by and through their respective counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure by agreement of counsel for good cause shown,

IT IS ORDERED THAT:

(1) Information designated "Confidential" under this Order, to the extent that it is disclosed, given or produced by any party during the pendency of this action, shall be used solely for the preparation for and use in this litigation and shall not be used or disclosed by any person receiving this information for any other purpose whatsoever.

(2) The parties may designate as "Confidential" the following types of documents and information:

- (a) Loudoun County Sheriff General Orders (not available to the public);
- (b) All training materials produced;
- (c) All personnel information produced; and
- (d) Plaintiff Mial's medical and mental health records.

(3) Parties must maintain the confidentiality of any confidential documents subject to this Order. Parties will do this by:

(a) Restricting access to confidential documents to the parties, and any of the parties' experts and fact witnesses on a good faith, as-needed basis; and

(b) Causing all persons identified above who may receive or have access to any confidential items to agree in writing, to be bound by the terms of this Order, and to be subject to the jurisdiction of this Court and possible discipline of this Court, including punishment for contempt of Court for any violation of this Order. The written agreement to be bound by this Order must be obtained prior to permitting access to any "Confidential" item.

(4) On final determination of this action, and within thirty (30) days of request by the other party, parties must destroy all documents designated as confidential by the other side and all copies of such documents; provided that documents listed as trial exhibits or used as deposition exhibits may be retained by counsel. If requested, parties will identify by Bates number documents they deem confidential.

(5) This order does not control the presentation or admission of any exhibits at trial, which matters will be determined by the trial Judge.

Nov 15, 2011
Date

/s/
Gerald Bruce Lee
United States District Judge

UNITED STATES JUDGE
UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

WE ASK FOR THIS:

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